

13

IN THE UNITED STATES DISTRICT COURT
FOR THE ~~██████████~~ DISTRICT OF OHIO
DIVISION

Received
~~FILED~~

JUL 11 2022

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
YOUNGSTOWN

Robert W. Johnson,
(Enter Above the Name of the Plaintiff in this Action)

Case: 2:22-cv-11842

Judge: Hood, Denise Page

MJ: Patti, Anthony P.

Filed: 08-10-2022

CMP JOHNSON VS. YOUNG ET AL (DP)

vs.
Robert J. Young, et al
(Enter above the name of the Defendant in this Action)

If there are additional Defendants, please list them:

Franklin County Board of Commissioners, Franklin County
Domestic Relations and Juvenile Court, Ohio Civil
Rights Commission, Lori Barreras, J. Rita McNeil Danish,
Mike DeWine, William Patman III, Madhu Singh, Charlie
Winburn, Angela Phelps-White, Aman Mehra & Andrew C.
Hofer.

COMPLAINT

I. Parties to the action:

Plaintiff: Place your name and address on the lines below. The address you give must be the address where the court may contact you and mail documents to you. A telephone number is required.

Robert W. Johnson
Name - Full Name Please - PRINT

112 COURT ST. :APT. 2
Street Address

WATERTOWN, NY 13601
City, State and Zip Code

Telephone Number

If there are additional Plaintiffs in this suit, a separate piece of paper should be attached immediately behind this page with their full names, addresses and telephone numbers. If there are no other Plaintiffs, continue with this form.

N/A

Defendant(s):

Place the name and address of each Defendant you listed in the caption on the first page of this Complaint. This form is invalid unless each Defendant appears with full address for proper service.

1. Franklin County Board of Commissioners
Name - Full Name Please
373 S. High St. : 25TH Floor : Columbus, OH 43215.
Address: Street, City, State and Zip Code
2. Franklin County Domestic Relations and Juvenile Court
373 S. High St. : 13TH Floor : Columbus, OH 43215.
3. Ohio Civil Rights Commission
30 E. Broad St. : 4TH Floor : Columbus, OH 43215.
4. Lori Barreras
30 E. Broad St. : 4TH Floor : Columbus, OH 43215.
5. J. Rita McNeil Danish
30 E. Broad St. : 4TH Floor : Columbus, OH 43215.
6. Mike DeWine
30 E. Broad St. : 4TH Floor : Columbus, OH 43215.

If there are additional Defendants, please list their names and addresses on a separate sheet of paper.

II. Subject Matter Jurisdiction

Check the box or boxes that describes your lawsuit:

- ☐ Title 28 U.S.C. § 1343(3)
[A civil rights lawsuit alleging that Defendant(s) acting under color of State law, deprived you of a right secured by federal law or the Constitution.]
- ☐ Title 28 U.S.C. § 1331
[A lawsuit "arising under the Constitution, laws, or treaties of the United States."]
- ☐ Title 28 U.S.C. § 1332(a)(1)
[A lawsuit between citizens of different states where the matter in controversy exceeds \$75,000.]
- ☒ Title _____ United States Code, Section _____
[Other federal status giving the court subject matter jurisdiction.]

Defendants:

7. William Patmon III

30 E. Broad St. : 4TH Floor : Columbus, OH 43215.

8. Madhu Singh

30 E. Broad St. : 4TH Floor : Columbus, OH 43215.

9. Charlie Winburn

30 E. Broad St. : 4TH Floor : Columbus, OH 43215.

10. Angela Phelps-White

30 E. Broad St. : 4TH Floor : Columbus, OH 43215.

11. Aman Mehra

30 E. Broad St. : 4TH Floor : Columbus, OH 43215.

12. Andree C. Hofer

30 E. Broad St. : 4TH Floor : Columbus, OH 43215.

III. Statement of Claim

Please write as briefly as possible the facts of your case. Describe how each Defendant is involved. Include the name of all persons involved, give dates and places.

Number each claim separately. Use as much space as you need. You are not limited to the papers we give you. Attach extra sheets that deal with your statement claim immediately behind this piece of paper.

Robert W. Johnson was discriminated against and denied Employment by Franklin County Board of Commissioners, Franklin County Domestic Relations and Juvenile Court, Robert J. Young and Andrea C. Hofer, Ohio Civil Rights Commission, Lori Barreras, J. Rita McNeil Danish, Mike DeWine, William Patmon III, Madhu Singh, Charlie Winburn, Angela Phelps-White and Aman Mehra denied Robert W. Johnson Due Process Rights and merits for above-said Employment Discriminations.

V. Relief

In this section please state (write) briefly exactly what you want the court to do for you. Make no legal argument, cite no case or statutes.

\$ 100,000,000.00 for punitive damages:
Employment: All other Reliefs Just
and Proper.

I state under penalty of perjury that the foregoing is true and correct. Executed on

this 25TH day of June, 2022.

Robert W. Johnson
Signature of Plaintiff

Defendants:

Franklin County Board of Commissioners,
Franklin County Domestic Relations and
Juvenile Court, Ohio Civil Rights Commission,
Lori Barreras, J. Rita McNeil Danish,
Mike DeWine, William Patmon III, Madhu
Singh, Charlie Winburn, Angela Phelps-
White, Aman Mehra & Andrew C. Hofer.

OHIO CIVIL RIGHTS COMMISSION

Board of Commissioners:

Lori Barreras – Chair
William W. Patmon, III
Madhu Singh
J. Rita McNeil Danish
Charlie Winburn



Angela Phelps-White,
Executive Director

Charging A. Party,

Robert W. Johnson

v.

Respondent,

Franklin County

Domestic Relations and Juvenile Court

)
)
)
)
) **Charge No. COLB1(49164)11192021**
) 22A-2022-00585C
)
)
)
)

NOTICE OF RIGHT TO SUE

Pursuant to Ohio Revised Code 4112.051, you may file a civil action against the Respondent(s) alleging a violation of Ohio Revised Code 4112. The lawsuit may be filed in any State of Ohio court that has jurisdiction over the matter. Ohio Revised Code 4112.052 and 4112.14 provides that such a civil action must be filed within two years after the date of the alleged discriminatory practice. The time period to file a civil action is tolled during the pendency of the Commission investigation. You are advised to consult with an attorney to determine with accuracy the date by which a civil action must be filed. FOR FEDERAL COURT FILINGS: Notices of Right to Sue under federal law will be issued by the EEOC.

FOR THE COMMISSION

A handwritten signature in black ink, appearing to read "Aman Mehra", is written over a horizontal line.

Aman Mehra
Columbus Regional Director
30 E. Broad St., 4th Floor
Columbus, OH 43215
(614) 466-5928

Date mailed: 06/23/2022



OHIO CIVIL RIGHTS COMMISSION

Governor Mike DeWine

Commissioners: Lori Barreras, Chair | J. Rita McNeil Danish | William Patmon, III | Madhu Singh | Charlie Winburn
Executive Director Angela Phelps-White

June 23, 2022

***Mailed on June 23, 2022

Robert W. Johnson
112 Court St.
Apt. 2
Watertown, NY 13601

E: robjoh2022@gmail.com

Robert J. Young, Human Resources Director
Franklin County Board of Commissioners
373 S. High Street
25 FL
Columbus, OH 43215

E: rjyoung@franklincountyohio.gov

LETTER OF DETERMINATION

Robert W. Johnson v. Franklin County
Domestic Relations and Juvenile Court
COLB1(49164)11192021;22A-2022-00585C

FINDINGS OF FACT:

Charging Party filed a charge of discrimination with the Ohio Civil Rights Commission ("Commission") alleging Respondent engaged in an unlawful discriminatory practice. All jurisdictional requirements for filing a charge have been met.

After receiving the charge, the Commission conducted an investigation into Charging Party's allegation(s) against Respondent. During the investigation, the Commission considered relevant documents and testimony. The information gathered does not support a recommendation that Respondent unlawfully discriminated against Charging Party. Specifically, the Commission found upon learning of Charging Party's inquiry for employment on Indeed.com, Respondent invited him to open interviews; however, Charging Party did not attend, nor did he submit an application.

DECISION:

The Ohio Civil Rights Commission determines it is **NOT PROBABLE** that Respondent has engaged in an unlawful discriminatory practice in violation of Ohio Revised Code Chapter 4112. Therefore, the Commission hereby orders that this matter be **DISMISSED**.

Please refer to the enclosed **NOTICE OF RIGHT TO SUE** for additional information on Charging Party's suit rights.

NOTICE OF RIGHT TO REQUEST RECONSIDERATION:

Pursuant to Ohio Administrative Code § 4112-3-04, you have the right to request reconsideration of the Commission's determination. The application must be in writing and state specifically the grounds upon which it is based. You must submit the request for reconsideration, along with all additional evidence or supporting documentation, within **TEN (10) days** of the date of mailing of this notice. This request must

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Domestic Relations and Juvenile Court
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be sent to the Compliance Department, Ohio Civil Rights Commission, 30 East Broad Street, 5th Floor, Columbus, Ohio 43215. Any application for reconsideration received after the ten-day period has expired will be deemed untimely. The Commission's Rules do not permit any employee of the Commission to grant any extension to this ten-day filing period. If you wish to appear before the Commissioners to present oral arguments in support of your request for reconsideration, you must specifically make a request to appear in writing.

FOR DUAL FILED CHARGES ONLY:

If your charge was filed with both the Commission and the U. S. Equal Employment Opportunity Commission (EEOC), you have the right to request that the EEOC conduct a review of the Commission finding. The request for such a review must be sent directly to the EEOC State and Local Coordinator at 101 W. Ohio St., Suite 1900, Indianapolis, IN 46204. To secure such a review, you must request it in writing within **FIFTEEN (15) days** of Commission's finding, unless you request a reconsideration by Commission. In that event, our final finding, and the time for you to request review by EEOC, will be determined by Commission's action on your reconsideration request.

NOTICE OF RIGHT TO PETITION FOR JUDICIAL REVIEW:

A determination of the Commission that constitutes a Final Order is subject to judicial review, wherein the court reviews the contents of this letter and determines if there are sufficient factual findings supporting why the Commission did not issue a complaint. A petition for judicial review must be filed in the proper common pleas court within **THIRTY (30) days** of the date the Commission mailed this Final Order. The right to obtain judicial review and the mode and procedure thereof is set forth in Ohio Revised Code § 4112.06.

The judicial review process is not a means to reexamine the investigation or further pursue your allegations through the Commission. You may consult with an attorney for information on available options.

A Probable Cause finding is not a Final Order and is not subject to judicial review by a court. All other determinations of the Commission constitute a Final Order and are subject to judicial review by a court.

FOR THE COMMISSION,



Aman Mehra
Regional Supervisor
Aman.Mehra@civ.ohio.gov

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Domestic Relations and Juvenile Court
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cc: Representative for Charging Party:
N/A

Representative for Respondent:
Andrea C. Hofer, Assistant Prosecuting
Attorney
Franklin County Domestic Relations &
Juvenile Court
373 S. High St.
13th Floor
Columbus, Ohio 43215
E: ahofer@franklincountyohio.gov

E:

The JS 44 civil cover sheet and the information contained hereon are to be used to replace or supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Robert W. Johnson

(b) County of Residence of First Listed Plaintiff
(EXCEPT IN U.S. PLAINTIFF CASES)

Jefferson

(c) Attorneys (Firm Name, Address, and Telephone Number)

112 Court St., APT. 2;
Watertown, NY 13601

DEFENDANTS

(Cont.) Robert J. Young,
FranklinCounty of Residence of First Listed Defendant
(IN U.S. PLAINTIFF CASES ONLY)NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

N/A

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question
(U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity
(Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|---------------------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input checked="" type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 INTELLECTUAL PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input checked="" type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation - Transfer
- ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

Brief description of cause:

Federal Question: Employment Discriminations.

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

☐ CHECK YES only if demanded in complaint. DEMAND: \$100,000,000.00 JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE 06/25/2022 SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

CERTIFICATE OF SERVICE

I, Robert W. Johnson, served a copy of Civil Cover Sheet, Civil Complaint & IFP Application on 06/25/2022 Upon:

~~1. Court Clerk: U.S. Courts: RWT
125 MARKET ST.; YOUNGSTOWN, OH 44503.~~

1. Court Clerk: U.S. Courthouse:
231 W. LAFAYETTE BLVD.; DETROIT, MI 48226.

Robert W. Johnson
Robert W. Johnson

06/25/2022

ROBERT W. JOHNSON
112 COURT ST.: APT. 2
WATERTOWN, NY 13601

paid

COURT CLERK
U.S. COURTHOUSE
231 W. LAFAYETTE BLVD.
DETROIT, MI 48226

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7/26/22

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U.S. DISTRICT COURT